

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

METROPOLITAN LIFE INSURANCE
COMPANY, a New York corporation,

Plaintiff,

V.

(1) SDM HOLDINGS, L.L.C., an Oklahoma Limited Liability Company; and

(2) SDM HOLDINGS, LLC, a Connecticut Limited Liability Company,

Defendants.

Case No. CIV-24-513

ANSWER TO COMPLAINT

The Receiver of Avon Capital, LLC in *Universitas Education, L.L.C. v. Nova Group, Inc.*, Case No. 14-FJ-05-HE, pending in the United States District Court for the Western District of Oklahoma, submits the following Answer on behalf of SDM Holdings, LLC, an Oklahoma Limited Liability Company (“SDM-OK”).¹

PARTIES²

1. SDM-OK is without sufficient information to admit or deny the allegations of Paragraph 1 and therefore denies the same.

¹ Avon Capital, LLC, a Wyoming Limited Liability Company, is the sole member of SDM-OK.

² For ease of reference only, SDM-OK utilizes the same headings utilized by the plaintiff in its Complaint.

2. SDM-OK admits the allegations of Paragraph 2.

3. SDM-OK is without sufficient information to admit or deny the allegations of Paragraph 3 and therefore denies the same.

JURISDICTION AND VENUE

4. The allegations in Paragraph 4 of the Complaint constitute legal statements and/or conclusions; therefore, no response is required nor intended.

5. The allegations in Paragraph 5 of the Complaint constitute legal statements and/or conclusions; therefore, no response is required nor intended.

INTERPLEADER

6. Upon information and belief, SDM-OK admits the allegations of Paragraph 6.

7. Upon information and belief, SDM-OK admits the allegations of Paragraph 7.

8. Upon information and belief, SDM-OK admits the allegations of Paragraph 8.

9. SDM-OK admits the allegations of Paragraph 9.

10. SDM-OK is without sufficient information to admit or deny the allegations of Paragraph 10.

11. SDM-OK admits, upon information and belief, that SDM Holdings, LLC, a Connecticut Limited Liability Company, is utilizing the Employer Identification Number of SDM-OK.

12. SDM-OK admits the allegations of Paragraph 12.

13. The Court Orders provided to the plaintiff are documents that speak for themselves, and any characterization of those Court Orders that are inconsistent with the express terms contained therein are denied.

14. The allegations in Paragraph 14 of the Complaint constitute legal statements and/or conclusions; therefore, no response is required nor intended.

15. SDM-OK is without sufficient information to admit or deny the allegations of Paragraph 15. The referenced Order speaks for itself.

16. This Court's Orders are documents that speak for themselves, and any characterization of this Court's Orders that are inconsistent with the express terms contained therein are denied.

17. The referenced Oklahoma Secretary of State's records are documents that speak for themselves, and any characterization of the Secretary of State's records that are inconsistent with the express terms contained therein are denied.

18. The allegations in Paragraph 18 of the Complaint constitute legal statements and/or conclusions; therefore, no response is required not intended.

19. The allegations in Paragraph 19 of the Complaint constitute legal statements and/or conclusions; therefore, no response is required nor intended.

20. The allegations in Paragraph 20 of the Complaint constitute legal statements and/or conclusions; therefore, no response is required nor intended.

21. The allegations in Paragraph 21 of the Complaint constitute legal statements and/or conclusions; therefore, no response is required nor intended.

22. The allegations in Paragraph 22 of the Complaint constitute legal statements and/or conclusions; therefore, no response is required nor intended.

23. The allegations in Paragraph 23 of the Complaint constitute legal statements and/or conclusions; therefore, no response is required nor intended.

24. SDM-OK is without sufficient information to admit or deny the allegations of Paragraph 24.

25. SDM-OK is without sufficient information to admit or deny the allegations of Paragraph 25 and therefore denies the same.

26. SDM-OK admits the allegations of Paragraph 26.

27. SDM-OK is without sufficient information to admit or deny the allegations of Paragraph 27.

28. SDM-OK is without sufficient information to admit or deny the allegations of Paragraph 28.

All allegations not specifically admitted are denied.

WHEREFORE, having answered, the Receiver for Avon Capital, LLC, on behalf of SDM-OK, prays for relief as the Court deems appropriate under the circumstances.

Dated: June 19, 2024

Respectfully submitted,

/s/ Heidi J. Long

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Education, LLC v. Nova Group, Inc.,
Case No. 14-FJ-05-HE in the United
States District Court for the Western
District of Oklahoma*

CERTIFICATE OF SERVICE

I hereby certify that on June 19, 2024 I electronically transmitted the attached document to the Clerk of Court using the ECF system for filing. Based on the records currently on file, the Clerk of Court will transmit a Notice of Electronic Filing to those registered participants of the ECF system.

/s/ Heidi J. Long

Heidi J. Long